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STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530
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SUBJECT: Application for amends to Licenses NPF-41, NPF-51 & NPF-65, changing Tech Specs to correct Table 3.3-6 re measurement ranges of main steam effluent line monitors. Fee paid.

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161-000666-EEVB/LJM
November 20, 1987

Docket Nos STN 50-528/529/530

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Document Control Desk

Dear Sirs:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Technical Specification Amendment - Section Table 3.3-6
File: 87-F-005-419.05; 87-B-056-026; 87-C-056-026; 87-D-056-026

Attached please find the proposed changes to the PVNGS Units 1, 2 and 3 Technical Specifications. The changes correct the measurement ranges of the Main Steam Effluent Line Monitors of Table 3.3-6. We request 30 days to implement the change after the date the change becomes effective.

Enclosed, with this amendment request package are the following:

A. Description of the Technical Specification Amendment Request.
B. Purpose of the Technical Specification.
C. Need for the Technical Specification Amendment.
D. Basis for Proposed No Significant Hazards Consideration Determination.
E. Safety Analysis for the Amendment Request.
F. Environmental Impact Consideration Determination.
G. Marked-up Technical Specification Change Pages.

By copy of this letter, we are also forwarding the proposed changes to the appropriate state agency.

In accordance with the requirements of 10CFR170.12(c), the license amendment application fee of $150.00 has been forwarded to the USNRC License Fee Management Coordinator.

A001
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If you have any questions, please call A. C. Rogers at (602) 371-4087.

Very truly yours,

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

EEVB/LJM/ls
Attachments

cc: O. M. De Michele
J. R. Ball
J. B. Martin
E. A. Licitra
A. C. Gehr
C. E. Tedford
R. M. Diggs (with WFD $150.00)

ATTACHMENT

A. DESCRIPTION OF THE TECHNICAL SPECIFICATION AMENDMENT REQUEST

The proposed amendment corrects the measurement ranges of the Main Steam Line Effluent Monitors, as set forth in Technical Specification (T.S.) Table 3.3-6.

B. PURPOSE OF THE TECHNICAL SPECIFICATION

The purpose of Table 3.3-6 is to identify the radiation monitoring instrumentation channels and to define their operability during the identified plant modes. The table also specifies the alarm/trip set points and the specific ACTION for each of the identified monitors.

C. NEED FOR THE TECHNICAL SPECIFICATION AMENDMENT

The measurement range of the Main Steam Line Effluent Monitors stated in Table 3.3-6 (RU-139 and 140) (10^0 to 10^7 mR/hr) is the range of the detector section of the monitors i.e., the range of measurable detectable radiation. The range of the measuring section of the monitors i.e., the range of accurately measured detectable radiation, is smaller (10^0 to 10^5 mR/hr). Because no clarification is made in the T.S., the operator must be aware of this fact to understand and use the table correctly. The proposed change would eliminate the need for prior knowledge and would ensure a clearer understanding of the table. Stating the smaller range of the monitors in the T.S. has no affect on the qualification of the monitors to Regulatory Guide 1.97.

D. BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

1. The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10CFR50.92. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with a proposed amendment would not: (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Involve a significant reduction in a margin of safety.

   A discussion of these standards as they relate to the amendment request follows:

   Standard 1--Involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed change corrects the measurement ranges of the Main Steam Line Effluent Monitors. The corrected numbers have been reverified and meet the requirements of Regulatory Guide 1.97. Since the requirements of 1.97 are met, no change to the safety analysis has been made and therefore, there will be no significant increase in the probability or consequences of an accident previously evaluated.

Standard 2--Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed change does not change the assumptions made for the safety analysis as it pertains to the monitors. The requirements of regulatory Guide 1.97 are still met and therefore, the assumptions are still the same.

Standard 3--Involve a significant reduction in a margin of safety.

The proposed change does not involve a significant reduction in a margin of safety because the proposed change does not change the assumptions made for the safety analysis as it pertains to the monitors.

2. The proposed amendment matches the guidance concerning the application of standards for determining whether or not a significant hazards consideration exists (51FR7751) by example:

   (i) A purely administrative change to Technical Specifications: for example, a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature.

E. SAFETY EVALUATION FOR THE AMENDMENT REQUEST

The proposed Technical Specification amendment will not increase the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR. The proposed change further defines the actual measurement ranges of the Main Steam Line Effluent Monitors. The proposed change does not change any of the assumptions of the safety analysis as it pertains to the monitors.

The proposed Technical Specification Amendment will not increase the probability for an accident or malfunction of a different type than any previously evaluated in the FSAR. The proposed change has not physically changed the monitors or limited the operations of said monitors in any way therefore, ensuring that the possibility of a different accident or malfunction will not be created.

The proposed Technical Specification amendment will not reduce the margin of safety as defined in the basis for the Technical Specification. The proposed change does not change any of the assumptions of the safety analysis as they pertain to the monitors and therefore does not change the basis.

The following is the calculation assuring qualification of the monitors to Regulatory Guide 1.97. The range as specified in RG 1.97 is 1E-1 to 1E 3 uci/cc. Utilizing conversion factors from EPIP 14A section 4.3.2.3 and the ANPP monitors' ranges of 10^{-3} to 10^{2} R/hr.

the monitor's lower range is equal to

10^{-3}R/hr (.078) $\frac{\text{uci/cc}}{\text{mR/hr}}$ = 7.8E -2 uci/cc

which is less than the low range specified by 1.97 of 1E-1 uci/cc

and the monitor's upper range is equal to

10^{2}R/hr (15.6) $\frac{\text{uci/cc}}{\text{mR/hr}}$ = 1.56E + 6 uci/cc

or

10^{2}R/hr (.078) $\frac{\text{uci/cc}}{\text{mR/hr}}$ = 7.8E + 3 uci/cc

either of which is greater than the high range specified by 1.97 of 1E 3 uci/cc. Therefore, the ANPP monitors satisfy the requirements of 1.97.

F. ENVIRONMENTAL IMPACT CONSIDERATION DETERMINATION

The proposed change request does not involve an unreviewed environmental question because operation of PVNGS Unit 1, 2 and 3, in accordance with this change, would not:

1. Result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by the staff's testimony to the Atomic Safety and Licensing Board; or

2. Result in a significant change in effluents or power levels; or

3. Result in matters not previously reviewed in the licensing basis for PVNGS which may have a significant environmental impact.

G. MARKED-UP TECHNICAL SPECIFICATION CHANGE PAGES

Limiting Conditions For Operation And Surveillance Requirement; 3/4 3-38